

Mark C. Mao, CA Bar No. 236165
Sean P. Rodriguez, CA Bar No. 262437
Alexander J. Kolnik, CA Bar No. 299291
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
Fax: (415) 293-6899
mmao@bsflfp.com
srodriguez@bsflfp.com
akonik@bsflfp.com

James Lee (admitted *pro hac vice*)
Rossana Baeza (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
Fax: (303) 539-1307
jlee@bsflfp.com
rbaeza@bsflfp.com

Counsel for Plaintiffs

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Tel: (312) 705-7400
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: (213) 443-3000
Fax: (213) 443-3100

Counsel for Defendant

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK

**JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
SUBMITTING [PROPOSED]
STIPULATED PROTECTIVE ORDER
AND [PROPOSED] STIPULATED
ORDER GOVERNING DISCOVERY OF
ELECTRONICALLY STORED
INFORMATION**

Judge: Honorable Lucy H. Koh

Pursuant to Civil Local Rule 6-2, this joint stipulation is entered into between Plaintiffs Chasom Brown, Maria Nguyen, William Byatt, Jeremy Davis, and Christopher Castillo (collectively, “Plaintiffs”) and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on September 3, 2020, the Court entered an order (Dkt. No. 61) requiring that the Parties file their “Stipulations re: Protective Order and ESI Protocol” by October 2, 2020;

WHEREAS, Google started the meet and confer process on September 1, 2020 by sending its proposed drafts of the [Proposed] Stipulated Protective Order (“Protective Order”) and [Proposed] Stipulated Order Governing Discovery of Electronically Stored Information (“ESI Order”) (*see* Declaration of Viola Trebicka, ¶ 3);

WHEREAS, the Parties are meeting and conferring in good faith regarding the Protective Order and ESI Order (*see id.*, ¶ 4);

WHEREAS, the Parties have several outstanding disputes that they continue to discuss to find mutually-agreeable compromises (*see id.*, ¶ 4);

WHEREAS, the Parties agree that an extension of time to file these stipulated orders will enable the Parties to either eliminate or substantially narrow their disputes (*see id.*, ¶ 5);

NOW THEREFORE, the Parties stipulate to extend the deadline by which the Parties shall submit a jointly agreed Protective Order and ESI Order to October 12, 2020.

DATED: October 1, 2020

BOIES SCHILLER FLEXNER LLP

By /s/ Mark C. Mao

Mark C. Mao

Counsel on behalf of Plaintiffs

DATED: October 1, 2020

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Stipulation And [Proposed] Order Extending Time For Submitting [Proposed] Stipulated Protective Order And [Proposed] Stipulated Order Governing Discovery Of Electronically Stored Information. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: October 1, 2020

By /s/ Andrew H. Schapiro
Andrew H. Schapiro
Counsel on behalf of Google

[PROPOSED] ORDER

Pursuant to stipulation of the parties, the Court hereby **ORDERS:**

The deadline for the Parties to file their proposed Protective Order and ESI Order shall be extended to October 12, 2020.

IT IS SO ORDERED.

DATED: _____, 2020

Hon. Lucy H. Koh
United States District Judge